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20 **UNITED STATES DISTRICT COURT**
21 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

22 AMERICAN CIVIL LIBERTIES UNION

23 FOUNDATION OF SOUTHERN

23 CALIFORNIA,

24 *Plaintiff,*

25 *v.*

26 UNITED STATES IMMIGRATION AND
27 CUSTOMS ENFORCEMENT, et al.,

28 *Defendants.*

Case No. 2:22-cv-04760-SHK

**JOINT STIPULATION TO
EXTEND BRIEFING SCHEDULE
ON MOTIONS FOR SUMMARY
JUDGMENT RE DEFENDANTS
DHS & OIG**

Honorable Shashi H. Kewalramani
United States Magistrate Judge

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1 IT IS HEREBY STIPULATED, by and between Plaintiff American Civil
 2 Liberties Union Foundation of Southern California and Defendants Department of
 3 Homeland Security (“DHS”) and DHS Office of Inspector General (“DHS-OIG”)
 4 (collectively “Defendants”), through their counsel, and subject to an order of this Court
 5 as follows:

6 1. On March 4, 2024, this Court entered an order setting a briefing schedule
 7 for the parties’ cross-motions for summary judgment as to Plaintiff’s claims against
 8 Defendants DHS and DHS-OIG.

9 2. The current deadline for Defendants DHS and DHS-OIG to file their cross
 10 motion for summary judgment and opposition brief to Plaintiff’s motion is March 27,
 11 2024.

12 3. On March 22, 2024, undersigned counsel for Defendant was advised by
 13 agency counsel for DHS-OIG that upon her recent return to her office from a multi-day
 14 work training conference, she learned that the DHS-OIG agency declarant was on leave
 15 and would not be returning to the office until early April.

16 4. The parties met and conferred regarding extending the current deadlines.
 17 Defendants DHS and DHS-OIG requested a two-week extension to file their cross
 18 motion for summary judgment and opposition brief, and Plaintiff agreed. The parties
 19 have reached an agreement, subject to the approval of this Court, to the following
 20 briefing schedule:

Defendants DHS and DHS-OIG File Cross Motion for Summary Judgment and Opposition Brief	April 10, 2024
Plaintiff Files Opposition and Reply Briefs	May 1, 2024
Defendants DHS and DHS-OIG File Reply Brief	May 15, 2024
Hearing on Cross-Motions	May 22, 2024, or at the convenience of the Court and the parties

26 5. The parties are aware that their proposed schedule only provides for one
 27 week between Defendants’ filing of their reply brief and the hearing on the cross-
 28

1 motions. This proposed schedule is requested based on Counsel for Defendants' need
2 for two weeks to prepare the reply brief, due to undersigned Defense counsel's pre-
3 scheduled April 30, 2024 trial before the Honorable Jesus G. Bernal. The proposed
4 schedule is also requested based on the unavailability of Plaintiff's counsel to set the
5 hearing date for May 29 through June 12, 2024.

6. Therefore, the parties respectfully request that the Court amend the briefing
7 schedule as set forth above, for the reasons set forth herein.
8

9 **IT IS SO STIPULATED.**

10 Dated: March 25, 2024

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16 */s/ Jason K. Axe*
17 JASON K. AXE
18 JOSEPH W. TURSI
19 Assistant United States Attorneys
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20 Dated: March 25, 2024

21 Respectfully submitted,
HOQ LAW APC

22 */s/ Laboni A. Hoq*
23 LABONI A. HOQ*
24 Attorneys for Plaintiff American Civil
25 Liberties Union Foundation of Southern
California

26 * Pursuant to Local Rule 5-4.3.4(2)(i), the filer attests that all other signatories listed,
27 and on whose behalf the filing is submitted, concur in the filing's content and have
authorized the filing.